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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC # _____
DATE FILED: 1/14/2020

Southern District of New York
Jennifer L. Brown
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MEMO ENDORSED

January 13, 2020


BY ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Jon Barry Thompson
19 Cr. 698 (ER)**

Dear Judge Ramos:

The January 15 initial conference is adjourned to February 27, 2020 at 4:00 p.m. Speedy trial time is excluded from January 15, 2020, until February 27, 2020, in the interest of justice.
SO ORDERED.



Edgardo Ramos, U.S.D.J
Dated: 1/14/2020
New York, New York

I write to request that the Court adjourn the conference currently scheduled for January 15, 2020, to permit Mr. Thompson and his counsel time to complete a review of the discovery so we can inform the Court regarding potential defense motions.

The government has produced discovery on a rolling basis. So far, discovery has been produced on October 28, November 7, December 4, and December 20. The government has informed us that it intends to produce additional discovery today. We have been reviewing the discovery diligently but will need additional time to review the most recent productions as well as any additional productions before we can advise the Court on potential defense motions.

For these reasons, we respectfully request that the Court adjourn the conference currently scheduled for January 15 to the week of February 24. We anticipate being able to set a motion schedule on that date. If the Court would like to set a tentative schedule now, we would propose a deadline of March 24 for defense motions, a deadline of April 14 for the government's response, a deadline of April 28 for the defense reply, and a date thereafter for a hearing or oral argument.

The government consents to this request and asks that the Court exclude from any Speedy Trial Act calculations the time from January 15 until the next conference date. The defense consents to that exclusion.

The Hon Edgardo Ramos
United States District Judge

January 13, 2020
Page 2

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19 Cr. 698

Thank you for your time and consideration of this request.

Respectfully submitted,

/s/

Peggy Cross-Goldenberg
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